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Barry N. Saltzman  
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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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	:
In the matter of the Petition to Stay the Arbitration	:
demand of THE NEW YORK RACING	:
ASSOCIATION, INC.,	:
	:
Petitioner,	:
	:
-against-	:
	:
THE NEW YORK HOTEL & MOTEL TRADES	:
COUNCIL, AFL-CIO A/A/F LOCAL 32BJ,	:
SERVICE EMPLOYEES INTERNATIONAL	:
UNION,	:
	:
Respondent.	:
-----	X

Case No. 12-CV-000832 (BMC)

**NOTICE OF MOTION OF THE  
NEW YORK HOTEL AND  
MOTION TRADES COUNCIL,  
AFL-CIO (UNION) FOR  
JUDGMENT ON THE  
PLEADINGS PURSUANT TO  
Fed. R. Civ. P. 12(c)**

**Oral Argument Requested  
(Served 3/13/12)**

PLEASE TAKE NOTICE that, upon the pleadings with attached exhibits, the accompanying memorandum of law dated March 13, 2012, and all prior proceedings had heretofore herein, Respondent, THE NEW YORK HOTEL AND MOTEL TRADES COUNCIL, AFL-CIO ("Union") will move before the Honorable Brian M. Cogan, U.S.D.J., at the United States Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201 on Thursday, March 29, 2012 for judgment on the pleadings pursuant to Fed. R. Civ. P. 12(c), dismissing Petitioner's Petition against the Union in its entirety and with prejudice, and granting the Union's motion for a judgment ordering the parties to arbitration, together with such further relief as the Court may deem just and proper. Pursuant to the Court's Scheduling

Order filed February 27, 2012, opposition papers are due on March 27, 2012. Oral argument, if any is ordered by the Court, will be on a date and time to be designated by the Court.

Dated: New York New York  
March 13, 2012

Respectfully submitted,

PITTA & GIBLIN, LLP  
*Attorneys for Defendant*  
*New York Hotel and Motel Trades Council,*  
*AFL-CIO*

By: 

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